

Matthew J. Lund
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Proposed Special Counsel for the Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|------------------------|
| In re |) | |
| |) | Chapter 11 Case No. |
| |) | 09-50026 (REG) |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , |) | |
| f/k/a General Motors Corp., <i>et al.</i> , |) | (Jointly Administered) |
| |) | |
| Debtors. |) | |
| |) | |

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Matthew J. Lund, a member in good standing of the bar in the State of Michigan and of the bars of the U.S. District Courts for the Eastern and Western Districts of Michigan, the Central District of California, the Eastern District of Texas and the Courts of Appeals for the Sixth and Seventh Circuits, request admission, *pro hac vice*, before the Honorable Robert E. Gerber, to represent the above-captioned Debtors as special counsel.

| | |
|----------------|-----------------------------|
| My address is: | Matthew J. Lund |
| | Pepper Hamilton LLP |
| | Suite 3600 |
| | 100 Renaissance Center |
| | Detroit, MI 48243-1157 |
| | Telephone: 313.393.7110 |
| | Facsimile: 313.259.7926 |
| | E-Mail: lundm@pepperlaw.com |

The filing fee of \$25.00 has been submitted with this motion for *pro hac vice* admission.

WHEREFORE, movant requests that the Court enter the Order Admitting
Matthew J. Lund to Practice *Pro Hac Vice* attached as Exhibit A.

Dated: March 5, 2010.

Respectfully submitted,

PEPPER HAMILTON LLP

/s/ Matthew J. Lund

Matthew J. Lund

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100 Renaissance Center

Detroit, MI 48243-1157

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Proposed Special Counsel for the Debtors

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtors.

)
) Chapter 11 Case No.
) 09-50026 (REG)
)
) (Jointly Administered)
)
)
)
)

ORDER

ORDERED, that Matthew J. Lund, Esq., is admitted to practice, *pro hac vice*, in the above referenced case, in the United States Bankruptcy Court, Southern District of New York, provided that the filing fee has been paid.

Dated: _____
New York, New York

/s/ _____
UNITED STATES BANKRUPTCY JUDGE